# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RICHARD CHAKEJIAN, on behalf of himself and all others similarly situated, )	
Plaintiffs, ) vs. )	C. A. No. 07- 2211
EQUIFAX INFORMATION SERVICES LLC,	CLASS ACTION
Defendant. )	

### PLAINTIFFS' PROPOSED JURY VERDICT FORM

## **Question No. 1.**

Did Equifax willfully fail to comply with its legal requirement to provide to each Class member an accurate notice conveying the results of its reinvestigation into the disputed public records credit information?

Yes \_\_\_\_\_ No\_\_\_\_\_
Proceed to Question No. 2.

## **Question No. 2.**

Did Equifax willfully fail to comply with its legal requirement to provide to each Class member an accurate description of the procedure used to determine the accuracy and completeness of the disputed public records information, including the business name and address of any furnisher of information contacted in connection with such information and the telephone number of such furnisher, if reasonably available?

Yes No	No

If your answer is "yes" to <u>either Question No. 1 or No. 2</u>, or to <u>both Question No. 1 and No. 2</u>, proceed to Question No. 3.

If your answer is "no" to <u>both</u> Question No. 1 <u>and</u> No. 2, your deliberations are concluded and you should so advise the marshal.

Question No. 3.	
What amount of statutory damages do you award to each member of the Class? (You <i>must</i> award no less than \$100 and no more than \$1,000).	
<u>\$</u>	
Proceed to Question No. 4.	
Question No. 4.	
What amount, if any, of punitive damages do you award to the Class as a whole?	
<u>\$</u>	
Advise the marshal that your deliberations are concluded.	
Date:	
FOREPERSON	

### **CERTIFICATE OF SERVICE**

I, John Soumilas, hereby certify that, on this date, I caused a true and correct copy of the foregoing Plaintiffs' Proposed Jury Verdict Form to be served by way of ECF Notification, upon the following:

Catherine Olanich Raymond, Esquire Christie Pabarue Mortensen & Young 1880 JFK Boulevard, 10<sup>th</sup> Floor Philadelphia, PA 19103

> Barry Goheen, Esquire Lewis P. Perling, Esquire King & Spalding 1180 Peachtree Street, NW Atlanta, GA 30309-3521

Attorneys for Defendant Equifax Information Services LLC

FRANCIS & MAILMAN, P.C.

/s John Soumilas

JOHN SOUMILAS Attorneys for Plaintiff Land Title Building, 19<sup>th</sup> Floor 100 South Broad Street Philadelphia, PA 19110 (215) 735-8600

DATE: April 26, 2010